

EXHIBIT B



U.S. Department of Justice

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BY EMAIL

December 19, 2014

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51 Sleeper Street, 5th Floor
Boston, MA 02210

Re: United States v. Dzhokhar Tsarnaev, Crim. No. 13-10200-GAO

Dear Counsel:

We write to provide additional materials with respect to two experts.

Communications Analysis

As we previously informed you, Forensic Examiner Michael McFarlane has personally conducted the binding procedures which were previously done by his subordinates in his lab. His proposed testimony continues to include that (1) the bombs in this case were exploded by separate transmitters; (2) the FlySky transmitter had been modified in a way that diminished its size and would limit its commercially intended purpose; (3) the recovered FlySky receiver had the same bind code as that the recovered FlySky transmitter; and (4) the recovered Spektrum receiver (from which, because of its post-blast condition, a bind code could not be recovered), was not compatible with the FlySky transmitter and could not be bound to it. We're providing a summary of his methodology related to extracting bind codes, as well as additional materials that he reviewed and noted. McFarlane will include his new observations in his testimony. Mr. McFarlane will testify to the fact that an exemplar transmitter/receiver pair that came with the exemplar RC Exceed radio-controlled car kit was cheaper, had fewer channels, and was an inferior product to the FlySky transmitter/receiver and the Spektrum transmitter/receiver, and they were all incompatible with each other.

Cell-Site Information

As we previously disclosed to you, Special Agent Chad Fitzgerald will testify about a limited number of cell-site geolocations within the data that we have provided in discovery. A

Timothy Watkins, Esq, et al.
December 19, 2014
Page 2

copy of the subset of data that he will use for his testimony is an exhibit to our opposition to the motion to exclude his testimony, as well as herewith. In addition, a draft of the plots that he will use, limiting the number of cell-site locations that he will testify to even further is also attached for your convenience, but is subject to supplementing or narrowing at trial. He will focus on April 15, 2013 through April 19, 2013.

If you have any questions, please do not hesitate to call.

Sincerely,

CARMEN M. ORTIZ
United States Attorney

By: /s/Aloke Chakravarty
Aloke Chakravarty
William Weinreb
Nadine Pellegrini
Assistant U.S. Attorneys